

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 27, 2013

Name of company(s) covered by this certification: Advocate Communications, Inc.
dba: Advanced Cable Communications

Form 499 Filer ID: 827186

Name of signatory: Jim Pagano

Title of signatory: Vice President/General Manager

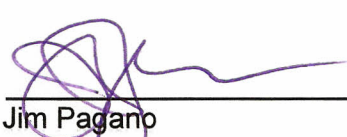
I, Jim Pagano, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Jim Pagano
Vice President /General Manager
Advocate Communications, Inc.
dba: Advanced Cable Communications




ATTACHMENT 1 TO OFFICER'S CPNI COMPLIANCE CERTIFICATE

Statement Regarding CPNI Operating Procedures

Advanced Cable Communications' written CPNI Operating Procedures ensure that Advance Cable will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Advanced Cable's CPNI Operating Procedures are:

- A requirement that Advanced Cable have at all times a CPNI Compliance Supervisor to supervise the implementation of Advanced Cable's CPNI Operating Procedures.
- Detailed procedures to safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- Detailed procedures for obtaining opt-out and opt-in approval from customers.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.